



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** NOV 09 2017

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
A&L Iron and Metal Company, Gaylord, Michigan 49735

**FROM:** Muhammed Shuaibi, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)

**TO:** File

---

**BASIC INFORMATION**

**Facility Name:** A&L Iron and Metal Company

**Facility Location:** 2000 Milbocker Rd., Gaylord, Michigan 49735

**Date of Inspection:** October 04, 2017

**EPA Inspector(s):**

1. Muhammed Shuaibi, Environmental Engineer
2. Scott Connolly, Environmental Engineer

**Other Attendees**

1. Bret Bandt, Vice President, A&L
2. Jason Harding, Operations Manager, A&L
3. Brian Miller, Purchasing, A&L

**Purpose of Inspection:** Assess compliance with the safe disposal regulations pertaining to refrigerant-containing appliances and motor vehicle air conditioners.

**Facility Type:** Scrap metal recycler and metal shredding facility

**Regulations Central to Inspection:** 40 C.F.R. Part 82 Subpart F

**Arrival Time:** 8:43AM

**Departure Time:** 10:30AM

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from facility personnel unless otherwise noted.

**Process Description:**

A&L accepts a variety of ferrous and non-ferrous metal items to be sorted and processed for recycling. The facility has a shredder, crusher, baler, and torching operations. Non-ferrous metals are sorted by category, and ferrous material is shredded, sorted with roll magnets and eddy current separator. Non-ferrous shredded material, or zorba, is sent to another facility for further processing. The sorted metal is then loaded on to trucks and sent to buyers.

**Staff Interview:** Mr. Harding stated that A&L accepts white goods and appliances if the supplier shows the item has been evacuated of CFCs by a certified technician. Items are rejected if proper certification is not provided. Vehicles make up almost 20-25% of the scrap feed. Cars are evacuated of all fluids and mercury switches are removed. The shredder operates almost every day during daylight hours. A&L operates a diesel engine connected to an electric generator in order to power their shredder. Facility staff stated that the engine was emission tested as required by their operating permit, but did not know when that occurred.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

Upon arrival inspectors observed visible emissions shredder's diesel engine stack. Visible emissions continued during shredder operations during the entirety of the inspection. Method 9 readings on the shredder engine stack were taken by Scott Connolly. Inspectors observed that the shredder stack pick up point was about 10-20 feet downstream from the hammermill.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were taken during this inspection.

Three six minute averages of Method 9 readings were taken at the shredder engine stack. Six-minute average were calculated to be 20.6, 20.2 and 23.3 respectively.

## CLOSING CONFERENCE

### **Requested documents:**

- Air testing documentation conducted in 2008
- Diesel engine emission testing report
- Any documentation/attempts in resolving engine stack concerns

**Compliance Assistance:** EPA provided Mr. Bandt with a small business fact sheet.

**Concerns:** EPA discussed opacity concerns from the diesel engine stack.

### SIGNATURES

Report Author:  Date: 10/30/17

Section Chief:  Date: 11/9/17

**Facility Name:** A&L Iron and Metal Company

**Facility Location:** 2000 Milbocker Rd., Gaylord, Michigan 49735

**Date of Inspection:** October 04, 2017

#### **APPENDICES AND ATTACHMENTS**

##### **Appendix A: Photo Log**

- Inspection photos: Documented in Appendix A, attached as external storage media, and maintained at C:\Users\mshuaibi\Documents\Cases\A&L Iron Metal\Photos.

**Facility Name:** A&L Iron and Metal Company

**Facility Location:** 2000 Milbocker Rd., Gaylord, Michigan 49735

**Date of Inspection:** October 04, 2017

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Scott Connolly	<b>2. Date(s) of Inspection:</b> October 04, 2017
<b>3. Company/Facility Name:</b> A&L Iron and Metal Company	<b>4. Street Address, City, State:</b> 2000 Milbocker Rd., Gaylord, Michigan 49735
<b>5. Number of Images:</b> 7	<b>6. Archival Record Location:</b> C:\Users\mshuaibi\Documents\Cases\A&L Iron Metal\Photos

<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. time zone and DST)</b>	<b>Latitude and Longitude</b>	<b>Description of Image</b>
1	RIMG0026.JPG	10/4/2017 7:33 AM	N/A	Opacity from engine stack
2	RIMG0027.JPG	10/4/2017 7:34 AM	N/A	Opacity from engine stack
3	RIMG0028.JPG	10/4/2017 8:33 AM	N/A	Exit belt
4	RIMG0029.JPG	10/4/2017 8:40 AM	N/A	Shredder
5	RIMG0030.JPG	10/4/2017 8:40 AM	N/A	Shredder
6	RIMG0031.JPG	10/4/2017 8:41 AM	N/A	Diesel Engine
7	RIMG0032.JPG	10/4/2017 8:50 AM	N/A	Opacity from engine stack